

## Seattle Urban Forestry Commission

Matt Mega, Chair • John Small, Vice-Chair • Nancy Bird • Gordon Bradley  
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**DRAFT v32**

~~January December 15, 2012~~

Roy Francis  
Seattle Department of Transportation  
Urban Forestry Division  
P.O. Box 34996  
Seattle, WA 98124-4996

RE: SDOT Draft Street Tree Ordinance UFC Recommendation

Dear Roy,

The Urban Forestry Commission appreciates the efforts of SDOT in cooperation with the other departments to propose the 2011 Street Tree Ordinance. Providing our citizens, departments, franchise operators and developers with updated guidance on managing right of way trees in our city is a major step toward improving our urban forest canopy. We have reviewed the draft document dated 10-05-2011 and the 12-12-2011 version and put forth the following comments and recommendations:

The ordinance does not clearly describe limitations to the type and extents of pruning allowed or clearly describe ramifications (exceptions/mitigation planting/contribution to tree fund/citation) to work beyond these limitations.

### Definitions:

We recommend clarifying the following terms:

(15024.6 page 5)

- Hazardous tree -- add a rating number in which a tree is considered hazardous. Also identify the method in which a hazard tree is assessed, typically either the specific Pacific Northwest International Society of Arboriculture Tree Risk Assessment in Urban Areas or Hazardous Tree Assessment. We are concerned that any tree may be considered a hazard without a specific number to designate a hazard tree.
- Supervise and Supervision ~~(as well as "on site")~~ -- we are concerned that 15.43.050 C might allow for one qualified supervisor to supervise multiple crews without being physically on site. This would not allow for crews to operate without oversight from a qualified arborist.
- Public place -- we suggest clarifying this further because there are public places not controlled by SDOT. We suggest giving examples of what's not considered a public place.
- Tree Canopy-missing this definition

- Street Tree Manual – The modified Tree Manual contains valuable information. We would like to discuss broader use of this document with you. aka SDOT Tree Standards Manual, this document did not come up in a search of the city website. We suggest would like to see the information contained in SDOT’s Street Tree Manual Standards and Specifications be incorporated into the City’s ROWIM, the Standard Specifications and the Standard Plans.

Site Distance- If the right of way is wider than typical are there variances to this 30 foot set back requirement? Many right of ways have planting strips that are wider than 10 feet so we are wondering if there is any allowance for plant height or tree placement in these conditions.

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#### Section 5 Tree Maintenance Guidelines

We suggest reviewing the wording to clarify what are guidelines versus standards for regulated trees. There is quite a bit of valuable information but hard to determine what property owners should do versus required to do. We also wonder if this information will be conveyed by DPD for new trees planted as part of development requirements. Finally will SDOT be considering a maintenance bond for trees planted during development to allow for the first few years of maintenance and described pruning.

#### Section 6 Tree Reports

This sections is very helpful. We suggest SDOT consider adding a standard matrix or table format so that tree reports have a consistent reporting improving readability for the general public.

- Major Pruning -- 15.43.030 B.2.b. could be further clarified by stating that “All major pruning shall use ANSI A300 Standard Specifications and comply with best management practices in the Street Tree Manual.” Also, we believe that describing major pruning this by % of canopy will be difficult for citizens to determine unless part of the public notice procedure includes supplying a digital photograph of the tree. (Note in the Tree Standards Excessive is described as 25% versus the 15%) We suggest either adding a graphic for the general public or describing in another way such as no more than 1 out of 5 limbs over 1 inch?
- Severe Crown Reduction -- is described as “not an acceptable form of pruning”. What are the repercussions to the individual that performs or directs Severe Crown Reduction? We suggest that enforcement be clarified so that there is improved compliance. The concern is that restrictions that are not enforced may actually cause more confusion in the general public.

#### Mitigation:

We have specific recommendations regarding developing additional guidance related to major pruning and removal of trees due to sidewalk, utility and franchise work.

Revisit the power and franchise issues in view of the reality that many necessary practices to keep trees from power lines results in detrimental effect to the health of the tree. We suggest a more streamlined approach to replacement of inappropriate trees with species adaptable to power line locations and/or mitigation through replanting.

1. If in order to maintain the integrity of power or communications line there is a detrimental effect on the tree the Utility should consult with SDOT's City Arborist. (this is in addition to the broader permit that is issued)
2. Mitigation could occur in different locations however we suggest that mitigation be tracked to the same neighborhood zone as the removal. The sixth prelude identifies replacement of two trees for every one tree removed from City property. How would one determine the criteria for this replacement? Currently, the ordinance identifies replanting only within 15.43.030 B.2.c.
3. Automatic trigger for mitigation when utilities 'top' or perform severe crown reduction on a tree. This mitigation, as stated in point #2, may occur in a different location within the neighborhood, may be in the form of a tree fund contribution (fee-in-lieu) or may be exempt (due to felling during a severe storm event).

Ownership and damage:

Clarify financial responsibility for removal of privately installed and maintained street trees. (Yakima v. Shaw (sp?) on ownership)

15.43.030 A 1 a

Suggest Tree planting be separated from shrub planting to assist public understanding of issues.

15.43.040 C. describes private party responsibility for damage to underground utilities due to root intrusion. We believe this clause is too broad. We recommend deleting the reference to damage done by the tree roots to the public sewers and storm drains. The wording would discourage tree planting in most urban frontage property and this is in conflict with the preludes to this ordinance and the urban forest management plan goals of increasing tree canopy.

15.43.020 C

This requires a permit for seasonal tree lights. We suggest this requirement be actively publicized during the public comment period so citizens are aware that this permit will be required

Street Tree Manual Standards and Specifications- UFC will review this document separately.

Public comment:

January 20 is the deadline for public comment. Since the ~~release-release occurred~~ during the busy holiday season we suggest extending the comment period by two weeks.

The Commission is pleased to see the inclusion of arborist certification requirements, requiring posting for tree removal and the positive results with your permit system. Finally we commend the Department for taking significant steps in improving the understanding and care of Seattle's trees within our right of way corridors. We believe these corridors provide critical links for our urban habitats.

Sincerely,



Matt Mega, Chair  
Seattle Urban Forestry Commission

cc: Council President Richard Conlin, Councilmember Bagshaw, Councilmember Burgess,  
Councilmember Clark, Councilmember Godden, Councilmember Harrell, Councilmember Licata,  
Councilmember Rasmussen, Councilmember O'Brien, Peter Hahn, Jill Simmons, Barbara Gray,  
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